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Proposed Attorneys for Chapter 11 Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SAN FERNANDO DIVISION**

In re:

IRONCLAD PERFORMANCE WEAR
CORPORATION, a California
corporation,

Debtor and Debtor in
Possession.

In re:

IRONCLAD PERFORMANCE WEAR
CORPORATION, a Nevada corporation,

Debtor and Debtor in
Possession.

- ☒ Affects both Debtors
- ☐ Affects Ironclad Performance Wear
Corporation, a California corporation only
- ☐ Affects Ironclad Performance Wear
Corporation, a Nevada corporation only

Lead Case No.: 1:17-bk-12408-MB

(Proposed to be) Jointly administered with:

1:17-bk-12409-MB
(Ironclad Performance Wear Corporation, a
Nevada corporation)

Chapter 11 Cases

**NOTICE OF HEARINGS ON
EMERGENCY "FIRST DAY" MOTIONS
FILED BY DEBTORS**

Emergency Hearing Schedule:

Date: September 13, 2017

Time: 2:00 p.m.

**Place: Courtroom 303
21041 Burbank Blvd.
Woodland Hills, CA 91367**

1 **PLEASE TAKE NOTICE** that, on September 13, 2017, at 2:00 p.m., the Court will hold
2 hearings on the below-listed emergency motions (the “Motions”) filed by Ironclad Performance
3 Corporation, a California corporation (“Ironclad California”), and Ironclad Performance
4 Corporation, a Nevada corporation (“Ironclad Nevada”), the debtors and debtors in possession in
5 the above-referenced Chapter 11 bankruptcy cases proposed to be jointly-administered. The
6 hearing will be held at the United States Bankruptcy Court for the Central District of California –
7 San Fernando Division, in Courtroom 303, located at 21041 Burbank Blvd., Woodland Hills, CA
8 91367.

9 **PLEASE TAKE FURTHER NOTICE** that the Motions, and other papers filed in
10 support of the Motions, will be served upon you on September 11, 2017, via overnight mail, such
11 that you will receive the Motions and other papers no later than the morning of September 12,
12 2017. Any parties seeking to obtain additional copies of the Motions may do so by contacting
13 proposed counsel to the Debtors whose contact information is as follows: Levene, Neale, Bender,
14 Yoo & Brill, L.L.P., Attn: Krikor J. Meshefejian, Esq., Email: kjm@lnbyb.com, Tel: (310) 229-
15 1234, Fax: (310) 229-1244, Address: 10250 Constellation Blvd., Suite 1700, Los Angeles, CA
16 90067.

17 The Motions that the Court will consider are:

18 1. DEBTORS’ EMERGENCY MOTION FOR ENTRY OF AN INTERIM ORDER:
19 (I) AUTHORIZING THE DEBTORS TO (A) OBTAIN POSTPETITION FINANCING
20 PURSUANT TO 11 U.S.C. §§ 105, 361, 362 AND 364, AND (B) UTILIZE CASH
21 COLLATERAL PURSUANT TO 11 U.S.C. §§ 361, 362, 363 AND 364; (II) GRANTING
22 ADEQUATE PROTECTION PURSUANT TO 11 U.S.C. §§ 361, 362, 363 AND 364; (III)
23 SCHEDULING A FINAL HEARING PURSUANT TO BANKRUPTCY RULES 4001(b) AND
24 4001(c); AND (IV) GRANTING RELATED;

25 2. DEBTORS’ MOTION FOR AN ORDER: (1) APPROVING FORM OF ASSET
26 PURCHASE AGREEMENT FOR STALKING HORSE BIDDER AND FOR PROSPECTIVE
27 OVERBIDDERS TO USE, (2) APPROVING AUCTION SALE FORMAT, BIDDING
28

1 PROCEDURES, AND STALKING HORSE BID PROTECTIONS; (3) APPROVING FORM OF
2 NOTICE TO BE PROVIDED TO INTERESTED PARTIES; AND (4) SCHEDULING A COURT
3 HEARING TO CONSIDER APPROVAL OF THE SALE TO THE HIGHEST BIDDER;

4 3. DEBTORS' EMERGENCY MOTION FOR AUTHORITY TO FILE LETTER
5 AGREEMENT UNDER SEAL;

6 4. DEBTORS' EMERGENCY MOTION FOR ENTRY OF AN ORDER
7 AUTHORIZING DEBTORS TO (1) PAY PRE-PETITION WAGES; AND (2) HONOR
8 ACCRUED VACATION AND LEAVE BENEFITS;

9 5. DEBTORS' EMERGENCY MOTION FOR ENTRY OF AN ORDER
10 AUTHORIZING DEBTORS TO PROVIDE ADEQUATE ASSURANCE OF FUTURE
11 PAYMENT TO UTILITY COMPANIES PURSUANT TO SECTION 366(c) OF THE
12 BANKRUPTCY CODE; and

13 6. DEBTORS' EMERGENCY MOTION FOR ENTRY OF AN ORDER: (A)
14 AUTHORIZING THE CONTINUED USE OF CERTAIN PORTION OF THE DEBTORS' CASH
15 MANAGEMENT SYSTEM, (B) AUTHORIZING THE MAINTENANCE OF PAYROLL AND
16 RECEIVABLES BANK ACCOUNTS; AND (C) AUTHORIZING BANKS TO RELEASE
17 ADMINISTRATIVE HOLDS AND/OR FREEZES ON THE DEBTORS' PRE-PETITION
18 ACCOUNTS

19 **PLEASE TAKE FURTHER NOTICE** that objections to the Motions may be made
20 orally at the hearings on the Motions.

21 Dated: September 11, 2017

IRONCLAD PERFORMANCE WEAR
CORPORATION, et al.

23 By: /s/ Krikor J. Meshefejian

24 RON BENDER
25 MONICA Y. KIM
26 KRIKOR J. MESHEFEJIAN
27 LEVENE, NEALE, BENDER, YOO
28 & BRILL L.L.P.
Proposed Counsel for Chapter 11 Debtors
and Debtors in Possession

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 10250 Constellation Boulevard, Suite 1700, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled **NOTICE OF HEARINGS ON EMERGENCY "FIRST DAY" MOTIONS FILED BY DEBTORS** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **September 11, 2017**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Ron Bender rb@lnbyb.com
- S Margaux Ross margaux.ross@usdoj.gov
- United States Trustee (SV) ustpreion16.wh.ecf@usdoj.gov
- Sharon Z. Weiss sharon.weiss@bryancave.com, raul.morales@bryancave.com

2. **SERVED BY UNITED STATES MAIL**: On **September 11, 2017**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **September 11, 2017**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Served via Attorney Service

Hon. Martin R. Barash
United States Bankruptcy Court
21041 Burbank Boulevard, Suite 342
Woodland Hills, CA 91367

☒ Service List served by Overnight Mail attached

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

September 11, 2017
Date

Stephanie Reichert
Type Name

/s/ Stephanie Reichert
Signature

Served by Overnight Mail:

Ironclad Performance Wear (8300)
OUST, Secured & Top 20

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Los Angeles, California 90017

U. S. Securities and Exchange
Commission
Attn: Bankruptcy Counsel
444 South Flower Street, Suite 900
Los Angeles, CA 90071-9591

Secured Creditor

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Attn: Mike Tutor, CEO
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Memphis, TN 38141

Counsel to Radians Wareham Holdings

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Counsel to Radians Wareham Holdings

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Top 20 Unsecured Creditors:

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